

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey T. Rees
Jennifer L. Rees fka Jennifer L. Ludwig,
Debtors

Rushmore Loan Management Services, LLC
as servicer for U.S. Bank National Association,
not in its individual capacity but solely as
trustee for RMTP Trust, Series 2021 Cottage-
TT-V,

Movant

v.

Jeffrey T. Rees
Jennifer L. Rees
Ronda J. Winnecour – Trustee,
Respondents

Case No. 19-23273-GLT

Chapter: 13

Judge: Gregory L. Taddonio

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP
Attorneys for Rushmore Loan Management Services,
LLC as servicer for U.S. Bank National Association, not
in its individual capacity but solely as trustee for RMTP
Trust, Series 2021 Cottage-TT-V
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver

of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: August 9, 2022

By: /s/ Lauren M. Moyer

Lauren M. Moyer, Esquire

FRIEDMAN VARTOLO LLP

Attorneys for Rushmore Loan Management Services,
LLC as servicer for U.S. Bank National Association, not
in its individual capacity but solely as trustee for RMTP
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey T. Rees Jennifer L. Rees fka Jennifer L. Ludwig, Debtors Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage- TT-V, Movant v. Jeffrey T. Rees Jennifer L. Rees Ronda J. Winnecour – Trustee, Respondents	Case No. 19-23273-GLT Chapter: 13 Judge: Gregory L. Taddonio
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CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on August 9, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading “Service by NEF,” and the full name and complete postal address for each party served by mail, is listed under the heading “Service by First-Class Mail.”

EXECUTED ON: August 9, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer

Lauren M. Moyer, Esquire

FRIEDMAN VARTOLO LLP

Attorneys for Rushmore Loan Management Services,
LLC as servicer for U.S. Bank National Association, not
in its individual capacity but solely as trustee for RMTP
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Service by NEF

Trustee

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600 Grant Street
Pittsburgh, PA 15219

Debtor's Counsel

Kenneth Steidl
Steidl & Steinberg
Suite 2830 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

U.S. Trustee

Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Service by First-Class Mail

Debtor

Jeffrey T. Rees
302 Aprilmae Way
Pittsburgh, PA 15237

Jennifer L. Rees fka Jennifer L. Ludwig
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Pittsburgh, PA 15237